IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

ContentGuard Holdings, Inc.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	Civil Action Nos.
Google Inc.,	§	2:14-cv-61-JRG
	§	
Defendant.	§	
	§	JURY TRIAL DEMANDED
	§	
	§	
	§	

PROTECTIVE ORDER REGARDING THE DISCLOSURE AND USE OF DISCOVERY MATERIAL FROM NON-PARTY PARAMOUNT PICTURES CORPORATION

Before this Court is a Stipulation Regarding the Disclosure and Use of Discovery Material from Non-Party Paramount Pictures Corporation by and between Plaintiff ContentGuard Holdings, Inc. ("ContentGuard"), Defendant Google Inc. ("Google"), and Non-Party Paramount Pictures Corporation ("Paramount") (collectively, the "Parties"). After careful consideration, the Court ORDERS:

Paramount's Protected Material may be produced upon entry of, and pursuant to, this Order, which adopts and incorporates all the terms of the Amended Protective Order (Dkt. No. 69), including without limitation Paragraph 6(e), with the following modifications:

1. As applied to Paramount's Protected Material, Paragraph 1(b) shall be replaced with the following: "Neither ContentGuard nor Google shall share Paramount's Protected Material with the defendants in the *ContentGuard Holdings, Inc. v. Amazon.com, et al.*, No. 2:13-

cv-01112-JRG action (hereinafter, "the Amazon action"), including but not limited to defendants'

outside counsel, absent express written permission from Paramount."

2. As applied to Paramount's Protected Material, Paragraph 6(a) shall be replaced

with the following: "(a) Basic Principles. Paramount's Protected Material shall be used solely for

this case, and not for any other purpose whatsoever, including without limitation the investigation

of, or preparation for, or the use in any other litigation or administrative proceedings; licensing

discussions; patent prosecution or acquisition, patent reexamination or reissue proceedings, or any

business or competitive purpose or function. Paramount's Protected Material shall not be

distributed, disclosed, or made available to anyone except as expressly provided in this Order."

3. Non-Party Paramount shall have the right to seek any and all necessary relief

from the Court, including but not limited to monetary damages, reasonable attorneys' fees and

costs, injunctive relief, and such other relief that the Court deems necessary and appropriate, to

ensure compliance with and to address non-compliance with this Stipulated Protective Order

and/or the Amended Protective Order against any party or non-party that receives, discloses, or

uses, whether in error or otherwise, any portion of Paramount's Protected Material in breach of

this Stipulated Protective Order.

So ORDERED and SIGNED this 22nd day of January, 2015.

RODNEY GILSTRAP

UNITED STATES DISTRICT JUDGE